

RECEIVED

APR 17 1996

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

In the Matter of )  
 )  
Telecommunications Services ) CS Docket No. 95-184  
Inside Wiring )  
 )  
Customer Premises Equipment ) DOCKET FILE COPY ORIGINAL

REPLY COMMENTS OF THE  
NATIONAL TELEPHONE COOPERATIVE ASSOCIATION

The Commission is considering here changes in its telephone and cable inside wiring rules and policies in light of the evolving and converging marketplace.

Comments were filed on March 18, 1996.

The National Telephone Cooperative Association ("NTCA") is a national association of approximately 500 LECs that provide telecommunications services to end users and interexchange carriers throughout rural and small-town America. Approximately 170 NTCA members also provide cable services, mostly to their subscribers under the prior rural exemption that permitted them to provide video programming to Census defined places with no more than 2500 inhabitants. All NTCA members are small companies which generally have small staffs. Consequently, the companies support simplified Commission procedures and rules that minimize regulatory burdens while allowing the companies to deliver services to the public in an efficient manner.

The Commission is concerned that certain differences between its cable and telephone inside wiring rules may cause confusion and impede the development of

2011-04-17 10:10:10  
1314101  
D+E

competition. These include differences in the demarcation point, signal leakage safeguards and rules regarding consumers' access to inside wiring.<sup>1</sup> Part of the Commission's concern is the establishment of regulatory parity among cable and telephony services in a converging marketplace. NTCA supports the concept of regulatory parity and the Commission's efforts in examining its rules to ensure that they do not favor one group of providers to the detriment of others. However, the Commission need not harmonize differing rules that address differing technological or practical solutions, achieve legitimate regulatory goals and that do not favor one group over another.

With respect to the demarcation point, the Commission asks whether it should establish a common demarcation point for wireline communications networks regardless of whether the networks are broadband or narrowband, or, cable or telephony services. USTA's comments suggest that the Commission should establish rules that recognize the differences between twisted pair service facilities and those required when coaxial cable is utilized. USTA also points out that the goal should be to ensure that the demarcation point is accessible and suggests that the Commission should take a pragmatic and flexible approach to achieve that goal.<sup>2</sup> It recommends that the demarcation point for both cable and telephone inside wiring be established as a Network Interface Point and be installed by the service provider. NTCA supports this view.

---

<sup>1</sup> Notice at ¶ 3.

<sup>2</sup> USTA Comments at 2-3.

NTCA agrees that the goal of the rules should be to ensure accessibility regardless of who the provider is. Both the subscriber and the provider are principally interested in the efficient delivery of services and the opportunity for choice. These purposes can be best accommodated by rules that are reasonable and flexible and that permit the subscriber to choose among providers in a competitive environment.

NTCA also agrees that consumers should have the right to provide and install their own broadband inside wiring on their side of the demarcation point.<sup>3</sup> Further, with respect to narrowband wiring inside the demarcation point, there is no need to change the rules that permit consumers access to the wire regardless of the type of service for which it is used.

NTCA also agrees with USTA's position that the Commission need not revisit the rules that have deregulated the installation and maintenance of simple and complex telephone inside wire.<sup>4</sup> It may be necessary to simplify cable rules relating to technical standards, the disposition of wiring after the termination of service, and the rates for

---

<sup>3</sup> USTA Comments at 6.

<sup>4</sup> USTA at 5.

wiring installation and maintenance. However, the reform of these rules should not result in the reregulation of installation and maintenance of simple and complex telephone inside wire.

Respectfully submitted,

NATIONAL TELEPHONE COOPERATIVE  
ASSOCIATION

By: David Cosson (By Inls)  
David Cosson  
(202) 298-2326

By: L. Marie Guillory  
L. Marie Guillory  
(202) 298-2359

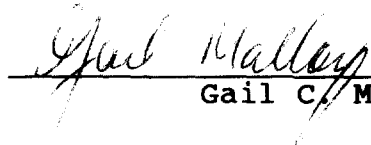
Its Attorneys

2626 Pennsylvania Avenue, N.W.  
Washington, D.C. 20037

April 17, 1996

CERTIFICATE OF SERVICE

I, Gail C. Malloy, certify that a copy of the foregoing Reply Comments of the National Telephone Cooperative Association in CS Docket No. 95-184 was served on this 17th day of April 1996, by first-class, U.S. Mail, postage prepaid, to the following persons on the attached list:

  
\_\_\_\_\_  
Gail C. Malloy

Chairman Reed E. Hundt  
Federal Communications Commission  
1919 M Street, N.W., Room 814-0101  
Washington, D.C. 20554

Commissioner James H. Quello  
Federal Communications Commission  
1919 M Street, N.W., Room 802-0106  
Washington, D.C. 20554

Commissioner Rachelle B. Chong  
Federal Communications Commission  
1919 M Street, N.W., Room 844-0105  
Washington, D.C. 20554

Commissioner Susan Ness  
Federal Communications Commission  
1919 M Street, N.W., Room 832-0104  
Washington, D.C. 20554

Mr. Kent Nilsson, Chief  
Cost Analysis Branch, Accounting  
and Audits Division  
Common Carrier Bureau  
Federal Communications Commission  
2000 L Street, N.W., Room 812-1600E  
Washington, D.C. 20554

International Transcription Service  
2100 M Street, N.W.  
Suite 140  
Washington, D.C. 20037

Regina A. Brown, Manager  
Environmental Issues  
International Council of  
Shopping Center  
1033 N. Fairfax St., Ste. 404  
Alexandria, VA 22314-1540

Arturo L. Fernandez, RPA  
President  
BOMA  
One Biscayne Tower  
2 S Biscayne Blvd. St 204  
Miami, FL 33131

Arturo L. Fernandez, RPA  
Codina Real Estate Management,  
Inc.  
World Trade Center  
80 SW 8th Street  
Suite 2100  
Miami FL 33130

Ms. Sharon A. Wall  
John Hancock Mutual Life  
Insurance Company  
John Hancock Place  
P.O. Box 111  
Boston, Massachusetts 02117

Cloyce Banister-Metzler-Bane, Ph.D  
President  
IPM Real Estate Services, Inc.  
P.O. Box 10625  
Golden, CO 80401

Mr. Gary Talles  
Robbins Realty  
1133 Greenwood Road  
Pikesville, MD 21208

James Love, Director  
Consumer Project on Technology  
P.O. Box 19367  
Washington, D.C. 20036

Debbie Smith, Property Manager  
Ash Tree Apartments  
826 I Cabell Ave.  
P.O. Box 5608  
Charlottesville, VA 22905

Bruce A. Ramsey, Esq.  
Kristin A. Ohlson  
Pacific Telesis Video Services  
2410 Camino Ramon, Suite 100  
San Ramon, CA 94583

Paul G. Curry, CPM  
N P. Dodge Mangement Company  
8701 West Dodge Road  
Suite 300  
Omaha, Nebraska 68114

Linda E. Martin, RPA  
Eakin & Smith, Inc.  
424 Church Street  
Suite 1506  
Nashville, TN 67219

Tammie J. Garman  
Property Manager  
3006 Hickory Woods Drive  
Roanoke, VA 24012

M. A. Turegano, President  
Regent Management, Inc.  
3115 Edenborn Avenue  
Metairie, Louisiana 70002

Edward N. Rizer,  
The Dayton Power and  
Light Company  
P.O. Box 8825  
Dayton, Ohio 45401

Mr. Steve Colella, Property  
Supervisor  
Pleasanton Village Apartments  
3735 Pleasanton Road  
San Antonio, Texas 78227

Steve Colella, Property Supervisor  
Aransas Princess Condominiums  
Homeowners Association  
720 Beach Access Road 1-A  
Port Aransas, TX 78373

Steve Colella, Property Supervisor  
Santa Fe Apartments  
539 Eleanor  
San Antonio, TX 78209

Barbara Beach, Staff VP  
1630 Duke Street  
Alexandria, VA 22314

Mr. William G. Constable  
P & J Realty Company  
104 Fifth Avenue  
New York, NY 10011-6997

Michael D. Kerr  
Senior Vice - President  
Siecor Corporation  
800 17th Street, N.W.  
Hickory, NC 28601-3336

Lee M. Holmes, President  
Guam Cable TV  
530 W. O'Brien Drive  
Agana, Guam 96910-4996

Terry S. Bienstock, P.A.  
Philip J. Kantor, Esq.  
Bienstock & Clark  
First Union Financial Center  
200 S. Biscayne Boulevard,  
Suite 3160  
Miami, FL 33131

Kevin Connelly, Property Manager  
Repulic Plaza  
Brookfield Management Colorado  
Inc  
370 17th St., Suite 3800  
Denver, Colorado 80202

Robert A. Potts, VP  
West Group  
1600 Anderon Road  
McLean, VA 22102

Michael Printz  
14 Bonnie Brook Road  
Westport, CT 06880-1506

Thomas C. Waldron, Jr. VP  
Director of Construction  
& Engineering  
Colliers ABR, Inc.  
40 East 52nd Street  
New York, NY 10022

Henry M. Rivera, Esq.  
Jay S. Newman, Esq.  
Ginsburg, Feldman and Bress,  
Chartered  
1250 Connecticut Ave., N.W.  
Suite 700  
Washington, D.C. 20036

Randall D. Fisher, Esq.  
John B. Glicksman, Esq.  
Leslie Brown, Esq.  
Adelphia Communications Corp.  
5 West Third Street  
Coudersport, PA 16915

Stephen E. Coran, Esq.  
William J. Andriele, Jr.  
Rini, Coran & Lancellotta, P.C.  
Dupont Circle Building  
1350 Connecticut Ave., N.W.  
Suite 900  
Washington, D.C. 20036

Mr. Quincy Rodgers, VP  
Ms. Christine G. Crafton, Director  
General Instrument Corporation  
1133 21st Street, N.W., Suite 405  
Washington, D.C. 20036

Mr. Robert M. Rast, VP  
Technical Business Dev.  
GI Communications Div.  
6262 Lusk Blvd.  
San Diego, CA 92121

Mr. Jeffrey A. Krauss, Ph.D.  
Consultant  
TTP  
17 West Jefferson St.  
Suite 106  
Rockville, MD 20805

John W. Pettit, Esq.  
Richard J. Arsenault, Esq.  
Drinker Biddle & Reath  
901 15th Street, N.W.  
Suite 900  
Washington, D.C. 20005

Michael H. Hammer, Esq.  
Francis M. Buono, Esq.  
Willkie Farr & Gallagher  
1155 21st Street, N.W.  
Suite 600  
Washington, D.C. 20036-3384

Steve Bickerstaff, Esq.  
Bickerstaff, Heath, Smiley, Pollan  
Kever & McDaniel, L.L.P.  
1700 Frost Bank Plaza  
816 Congress Avenue  
Austin, TX 78701-2443

William J. Balcerski, Esq.  
NYNEX Telephone Cos.  
1111 Westchester Avenue  
White Plains, NY 10604



Mark C. Rosenblum, Esq.  
Ava B. Kleinman, Esq.  
Seth S. Gross, Esq.  
AT&T  
295 North Maple Avenue  
Room 3245F3  
Basking Ridge, NJ 07920

Stephen R. Effros, President  
Mr. James H. Ewalt, EVP  
Cable Telecommunications  
Association  
P.O. Box 1005  
3950 Chain Bridge Road  
Fairfax, VA 22030

Mr. Steven J. Cox  
Sr. Vice President  
Business Affairs & Gen. Counsel  
DIRECTV, Inc.  
2230 East Imperial Highway  
El Segundo, CA 90245

Mr. Ronald Angner, Chair  
TIA User Premises  
Equipment Division  
2500 Wilson Blvd.  
Arlington, VA 2201

James A. Nappi, Esq.  
Stat of New Jersey  
Board of Public Utilities  
Two Gateway Center  
Newark, NJ 07102

Mark J. Palchick, Esq.  
Thomas B. Magee, Esq.  
Vorys, Sater, Seymour and Pease  
1828 L Street, N.W., 11th floor  
Washington, D.C. 20036-5104

Mary Mack Adu, Esq.  
State of California & the  
PUC of California  
505 Van Ness Ave.  
San Francisco, CA 94102

Paul Glist, Esq.  
Cole, Raywid & Braverman  
1919 Pennsylvania Ave., N.W.  
Suite 200  
Washington, D.C. 20006

Mr. David L. Meier, Dir.  
Cincinnati Bell Telephone Company  
201 E. Fifth St., P.O. Box 2301  
Cincinnati, OH 45201-2301

Peter B. Keisler, Esq.  
David L. Lawson, Esq.  
AT&T  
1722 Eye Street, N.W.  
Washington, D.C. 20006

Mr. John Gage  
President, BICSI  
10300 University Center Drive  
Suite 100  
Tampa, Florida 33612

M. James R. Hobson, Vice President  
Donelan, Cleary, Wood & Maser, PC  
1275 K Street, N.W., Suite 750  
Washington, D.C. 20005

Michael J. Karson, Esq.  
Ameritech Operating Companies  
2000 West Ameritech Center Drive  
Room 4H84  
Hoffman Estates, IL 60196-1025

Stuart E. Overby, Assistant Director  
for Spectrum Planning  
Motorola, Inc.  
1350 I Street, N.W., Suite 400  
Washington, D.C. 20005

Barbara M. Kessler, Esq.  
Cablevision Systems Corp.  
One Media Crossways  
Woodbury, NY 11797

Gerald Stevens-Kittner, Esq.  
Peter H. Doyle, Esq.  
Arter & Hadden  
1801 K Street, N.W.  
Suite 400K  
Washington, D.C. 20006

Deborah C. Costlow, Esq.  
Alan G. Fishel, Esq.  
Winston & Strawn  
1400 L Street, N.W., 8th Floor  
Washington, D.C. 20005

Gary Phillips, Esq.  
Ameritech  
1401 H Street, N.W.  
Suite 1020  
Washington, D.C. 20005-2136

Jeffrey L. Sheldon, Esq.  
Thomas E. Goode, Esq.  
UTC  
1140 Connecticut Ave., N.W.  
Suite 1140  
Washington, D.C. 20036

M. Robert Sutherland, Esq.  
Theodore R. Kingsley, Esq.  
BellSouth Corp & BellSouth Telcomms,  
Inc.  
1155 Peachtree Street, N.E.  
Atlanta, Georgia 30309

Margaret E. Garber, Esq.  
Pacific Bell & Nevada Bell  
1275 Pennsylvania Avenue, N.W.  
Washington, D.C. 20004

Lucille M. Mates, Esq.  
Sarah Rubenstein, Esq.  
Pacific Bell  
140 New Montgomery St., Room 1526  
San Francisco, CA 94105

Andrew D. Lipman, Esq.  
Mark Sievers, Esq.  
Swidler & Berlin, Chartered  
3000 K Street, N.W.  
Suite 300  
Washington, D.C. 20007

Peter D. Ross, Esq.  
Wiley, Rein & Fielding  
1776 K Street, N.W.  
Washington, D.C. 20006

Charles S. Walsh, Esq.  
Craig A. Gilley, Esq.  
Fleischman & Walsh, P.C.  
1400 16th Street, N.W.,  
Suite 600  
Washington, D.C. 20036

Aaron I. Fleischman, Esq.  
Arthur H. Harding, Esq.  
Fleischman & Walsh, P.C.  
1400 16th Street, N.W.,  
Suite 600  
Washington, D.C. 20036

Nicholas P. Miller, Esq.  
William Malone, Esq.  
Miller, Canfield, Paddock and Stone.  
P.L.C.  
1225 19th Street, N.W.  
Suite 400  
Washington, D.C. 20036

Barbara M. Kessler  
Senior Associate Counsel -  
Cable Operations  
Continental Cablevision, Inc.  
Pilot House  
Lewis Wharf  
Boston, MA 02110

Daniel L. Brenner, Esq.  
Loretta P. Polk, Esq.  
NCTA, Inc.  
1724 Massachusetts Ave., N.W.  
Washington, D.C. 20036

Henry Goldberg, Esq.  
W. Kenneth Ferree, Esq.  
Goldberg, Godles, Wiener & Wright  
1229 19th Street, N.W.  
Washington, D.C. 20036

Jonathan Jacob Nadler, Esq.  
Adam D. Krinsky, Esq.  
Squire, Sanders & Dempsey  
1201 Pennsylvania Avenue, N.W.  
Washington, D.C. 20044

Herbet E. Marks, Esq.  
Brian J. McHugh, Esq.  
Squire, Sanders & Dempsey  
1201 Pennsylvania Avenue, N.W.  
Washington, D.C. 20044

Frank W. Lloyd, Esq.  
Christoph J. Harvie, Esq.  
Charon J. Harris, Esq.  
Mintz, Levin, Cohn, Ferris,  
Glovsky and Popeo, P.C.  
701 Pennsylvania Ave., Suite 900  
Washington, D.C. 20004

Gregory L. Cannon, Esq.  
US West Communications, Inc.  
1020 19th Street, N.W., Suite 700  
Washington, D.C. 20036

Mr. Robert W. Taylor  
Director - Regulatory Affairs  
520 W. Arapaho  
Richardson, TX 75080

Paul J. Sinderband, Esq.  
Robert D. Primosch, Esq.  
Wilkinson, Barker, Knauer & Quinn  
1735 New York Ave., N.W.  
Washington, D.C. 20006

W. James MacNaughton, Esq.  
Liberty Cable Company, Inc.  
90 Woodbridge Center Drive  
Suite 610  
Woodbridge, NJ 07095

Jeffrey A. Campbell, Manager  
Federal Government Affairs  
Compaq Computer Corporation  
1300 I Street, N.W., 490 East  
Washington, D.C. 20005

Matthew J. McCoy, Esq.  
George A. Hanover, Esq.  
Consumer Electronics Manufacturers  
Assoc.  
2500 Wilson Boulevard, Suite 300  
Arlington, VA 22201

Mary McDermott, Esq.  
Linda Kent, Esq.  
Charles D. Cosson, Esq.  
USTA  
1401 H Street, N.W.  
Suite 600  
Washington, D.C. 20005